



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

JUL 12 2010

Patricia A. Grantham, Forest Supervisor
Klamath National Forest
1312 Fairlane Road
Yreka, CA. 96097-9549
Attn: Hi-Grouse Project

Subject: Draft Environmental Impact Statement for the Hi-Grouse Project,
Siskiyou County, California (CEQ# 20100194)

Dear Ms. Grantham:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The modified proposed action (Alternative 4) will manage vegetation through thinning and burning on approximately 3,847 acres across a 7,450 acre project area in the Klamath National Forest within the Gooseneck Ranger District. 1,537 acres is proposed for prescribed underburning and about 3,498 acres will be utilized for commercial thinning. EPA understands that the project is intended to provide a sustainable timber supply for local communities and sustain diverse, fire-resilient ecosystems and a functioning forest and watershed.

EPA acknowledges the importance of the project's goals of improving forest health, reduce fuel loading, and decreasing fuels along important access roads to allow better access for fire suppression activities during fire events. We support the use of thinning and prescribed underburning as important measures necessary to reduce the risk of fire, promote biodiversity, and restore natural ecological processes within the forest. Project features such as limiting the amount of new road construction and road maintenance actions will help minimize adverse effects. We support the best management practices (BMPs) and resource protection measures included in the project design and have rated the DEIS as Lack of Objections—LO (see enclosed "Summary of Rating Definitions").

EPA recommends full disclosure of information regarding air quality emissions. The document states that the project is exempt from a general conformity determination because Siskiyou County is in attainment for PM_{2.5} and PM₁₀ (pg. 115). However, Siskiyou County is in non-attainment status for ozone (pg. 115) and the Hi-Grouse


project will release pollutants including the ozone precursors volatile organic compounds (VOC) and nitrous oxides (NOx) (pg. 114). In accordance with the Clean Air Act (CAA) General Conformity requirements, in federal non-attainment and maintenance areas, a determination must be made that emissions will not exceed the applicable *de minimis* threshold levels, measured in tons per year, for criteria pollutants of concern. If emissions would exceed an applicable *de minimis* threshold, a conformity determination is required to document how the federal action will affect the State Implementation Plan (SIP). The final environmental impact statement (FEIS) should quantify the emissions from the Hi-Grouse project, determine if they will exceed *de minimis* thresholds for ozone precursors VOC and NOx, and whether a general conformity determination is needed that will demonstrate compliance with the SIP.

The DEIS states that a smoke management plan will be submitted to Siskiyou County Air Pollution Control District (SCAPCD) prior to any prescribed burning. The FEIS should include details regarding the smoke management plan that sets forth how the project will comply with the SCAPCD regulations for pile burning and smoke management, an implementation schedule, the responsible parties, and monitoring and reporting requirements.

Additionally, EPA recommends clarification regarding possible use of herbicides or pesticides. The list of applicable BMPs for the Hi-Grouse Project is included in Appendix D. BMPs 5.8-5.11 list potential best practices for use of pesticides and/or herbicides but the DEIS does not indicate that pesticides may be used. If pesticide use is included in the scope of the project, this information and all environmental impacts associated should be disclosed in the FEIS.

We appreciate the opportunity to review this DEIS and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD to the address above (mail code: CED-2). If you have any questions, please contact Stephanie Skophammer, the lead reviewer for this project, at (415) 972-3098 or skophammer.stephanie@epa.gov, or contact me at (415) 972-3521.

Sincerely,


for

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosures: Summary of EPA Rating Definitions

cc: Siskiyou County Air Pollution Control District
Wendy Dobrowolski, Goosenest Ranger District

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

